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STEVEN Z. LEGON  
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July 18, 2023

BY E.C.F.

Hon. Colleen McMahon  
United States District Judge  
Southern District of New York  
500 Pearl Street  
New York, NY 10007

MEMO ENDORSED  
7/20/23

Sentencing Adj. to  
Sept. 27, 2023  
At 2pm.

Re: *United States v. Quincy Hilliard*, No. 22 Cr. 82 (CM)

*Colleen McMahon*

Dear Judge McMahon:

The purpose of this letter motion is to request a continuance of the defendant's sentencing in the above-referenced criminal matter, which is presently scheduled for July 26, 2023 at 2:00 p.m., to a date in September 2023, which is convenient with the court.

This request is made as a result of counsel's recent engagement on trial. Counsel was actually engaged in the matter of *People v. David Marrero*, a New York State homicide trial in Bronx County, for approximately eleven weeks, from Monday, March 20, 2023 until Friday, June 2, 2023. Since the trial verdict, counsel has been busy addressing many different matters, including the filing of an appellate brief with the Second Circuit, as well as a detailed sentencing submission in another criminal matter in the Southern District of New York. Additionally, counsel has not taken a vacation since prior to the Covid-19 pandemic, and has plans to take a family vacation with his children and grandchildren, away from New York, for the remainder of the month of July, and into the first few weeks of August.

A.U.S.A. Ashley C. Nicolas has been advised of counsel's intention to file this application, and she has no objection on behalf of the government.

Thank you for your consideration of this application, and if your Honor has any questions or requires additional information, please contact me at your Honor's convenience.

Respectfully,

*Anthony L. Ricco*

Anthony L. Ricco, Esq.

ALR/jh

cc: A.U.S.A. Ashley C. Nicolas (By E.C.F.)

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